### UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	MDL No. 2323
This relates to:  Plaintiffs' Master Administrative Long- Form Complaint and George Andrie, et al. v NFL, USDC, EDPA, no. 12-cv-5059	SHORT FORM COMPLAINT IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION
SHELTON ROBINSON	JURY TRIAL DEMANDED

### **SHORT FORM COMPLAINT**

- 1. Plaintiff, **SHELTON ROBINSON**, brings this civil action as a related action in the matter entitled IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION, MDL No. 2323.
- 2. Plaintiff is filing this short form complaint as required by this Court's Case Management Order No. 2, filed April 26, 2012.
- 3. Plaintiff, incorporates by reference the allegations (as designated below) of the Master Administrative Long-Form Complaint, as may be amended, as if fully set forth at length in this Short Form Complaint.
  - 4. NOT APPLICABLE

5. Plaintiff, **SHELTON ROBINSON**, is a resident and citizen of Bothell, Washington and claims damages as set forth below.

### 6. NOT APPLICABLE

9.

- 7. On information and belief, the Plaintiff sustained repetitive, traumatic sub-concussive and/or concussive head impacts during NFL games and/or practices. On information and belief, Plaintiff suffers from symptoms of brain injury caused by the repetitive, traumatic sub-concussive and/or concussive head impacts the Plaintiff sustained during NFL games and/or practices. On information and belief, the Plaintiff's symptoms arise from injuries that are latent and have developed and continue to develop over time.
- 8. The original complaint by Plaintiff(s) in this matter was filed in United States

  District Court, Eastern District of Pennsylvania.

Plaintiff claims damages as a result of [check all that apply]:				
<u>X</u>	Injury to Herself/Himself			
<u>X</u>	Injury to the Person Represented			
_	Wrongful Death			
	Survivorship Action			
<u>X</u>	Economic Loss			
	Loss of Services			
	Loss of Consortium			

NOT APPLICABLE

1.

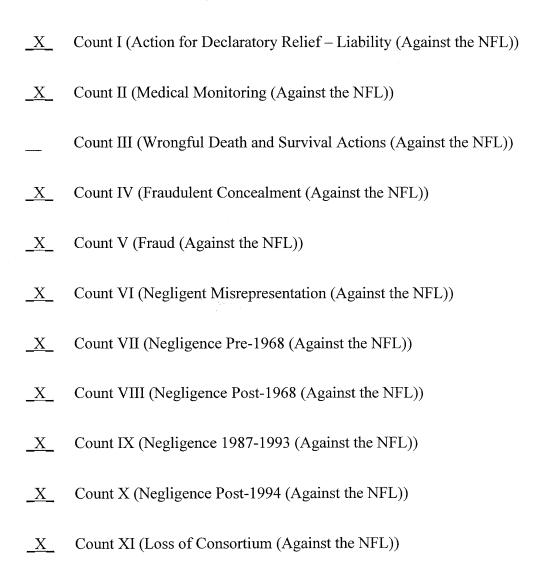
2.	X Plaintiff, reserves the right to object to federal jurisdiction.				
<u>DEFENDANTS</u>					
3. that apply]:	Plaintiff brings this case against the following Defendants in this action [check al				
	X National Football League				
	X NFL Properties, LLC				
	Riddell, Inc.				
	All American Sports, Inc. (d/b/a Riddell Sports Group, Inc.)				
	Riddell Sports Group, Inc.				
	Easton-Bell Sports, Inc.				
	Easton-Bell Sports, LLC				
	EB Sports Corporation				
	RBG Holdings Corporation				
4.	NOT APPLICABLE				
5.	NOT APPLICABLE				

6. Plaintiff played in X the National Football League ("NFL") and/or in X the American Football League ("AFL") during 1982-88 for the following teams:

Seattle Seahawks
Detroit Lions

#### **CAUSES OF ACTION**

7. Plaintiff herein adopts by reference the following Counts of the Master Administrative Long-Form Complaint, along with the factual allegations incorporated by reference in those Counts [check all that apply]:



	<u>X</u>	Count XII (Negligent Hiring (Against the NFL))
	<u>X</u>	Count XIII (Negligent Retention (Against the NFL))
	_	Count XIV (Strict Liability for Design Defect (Against the Riddell Defendants))
		Count XV (Strict Liability for Manufacturing Defect (Against the Riddell Defendants))
		Count XVI (Failure to Warn (Against the Riddell Defendants))
		Count XVII (Negligence (Against the Riddell Defendants))
	<u>X</u>	Count XVIII (Civil Conspiracy/Fraudulent Concealment (Against All Defendants))
8.	Plaint	ciff asserts the following additional causes of action [write in or attach]:

## **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, prays for judgment as follows:

A. An award of compensatory damages, the amount of which will be determined at trial;

- B. For punitive and exemplary damages as applicable;
- C. For all applicable statutory damages of the state whose laws will govern this action;
- D. For medical monitoring, whether denominated as damages or in the form of equitable relief;
- E. For an award of attorneys' fees and costs;
- F. An award of prejudgment interest and costs of suit; and
- G. An award of such other and further relief as the Court deems just and proper.

#### JURY DEMANDED

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff(s) hereby demand(s) a trial by jury.

#### RESPECTFULLY SUBMITTED:

/s/ Gene Locks

Gene Locks, Esquire (PA ID No. 12969)
Michael B. Leh, Esquire (PA ID No. 42962)
David D. Langfitt, Esquire (PA ID No. 66588)
601 Walnut Street, Suite 720 East
Philadelphia, PA 19106
215-893-0100 (tel.)
215-893-3444 (fax)
glocks@lockslaw.com
mleh@lockslaw.com
dlangfitt@lockslaw.com

and

Craig R. Mitnick, Esquire Managing Partner Mitnick Law Offices Thirty-Five Kings Highway East, Haddonfield, New Jersey 08033

# 

856.427.9000 (tel.) F. 856.427.0360 (fax) craig@crmtrust.com

Attorneys for Plaintiffs